

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
COLUMBUS, OHIO

UNITED STATES OF AMERICA, : CASE NO. 3:18 CR 032

Plaintiff : JUDGE THOMAS M. ROSE

v. :

STERLING H. ROBERTS (1) :
(Counts 1, 2 & 3) :

TAWNNEY M. CALDWELL (2) : SUPERSEDING INDICTMENT
a/k/a Tawnney Thomas, : 18 U.S.C. § 2
(Counts 1, 2, 3, 5 & 6) : 18 U.S.C. §§ 922(g)(1) and 924(a)(2)

INTENTIONALLY OMITTED : 18 U.S.C. § 1512(b)

CHRISTOPHER C. ROBERTS (4) : 18 U.S.C. § 1512(c)(1)
(Count 2) : 18 U.S.C. § 2261A(1)(A)

JAMES T. HARMON (5) : 18 U.S.C. § 2261A(2)(A)
(Count 2) :

CHANDRA D. HARMON (6) :
(Count 6) :

Defendants. :

THE GRAND JURY CHARGES THAT:

COUNT 1
[18 U.S.C. §§ 2261A(2)(A) and 2]

Between on or around August 1, 2017 and August 5, 2017, in the Southern District of Ohio,
STERLING H. ROBERTS, aided and abetted by **TAWNNEY M. CALDWELL** (a/k/a
TAWNNEY THOMAS), with the intent to kill, injure, harass, intimidate, and place under

surveillance with intent to kill, injure, harass, and intimidate another person, to wit: Robert Caldwell, used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any facility of interstate or foreign commerce to engage in conduct that placed that person in reasonable fear of the death of or serious bodily injury to that person.

In violation of 18 U.S.C. §§ 2261A(2)(A) and 2.

COUNT 2
[18 U.S.C. §§ 922(g)(1) and 924(a)(2) and 2]

On or about August 15, 2017, in the Southern District of Ohio, **STERLING H. ROBERTS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and aided and abetted by **CHRISTOPHER C. ROBERTS**, **TAWNNEY M. CALDWELL** (a/k/a **TAWNNEY THOMAS**), and **JAMES T. HARMON**, knowingly possessed a firearm in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2) and 2.

COUNT 3
[18 U.S.C. §§ 2261A(1)(A), 2261(b) and 2]

Between on or around August 12, 2017 and August 15, 2017, in the Southern District of Ohio and elsewhere, **STERLING H. ROBERTS**, aided and abetted by **TAWNNEY M. CALDWELL** (a/k/a **TAWNNEY THOMAS**) knowingly traveled in interstate commerce with the intent to kill, injure, harass, and intimidate another person, to wit: Robert Caldwell, and in the course of, or as a result of, such travel or presence engaged in conduct that placed that person in reasonable fear of the death or serious bodily injury to that person, and the death of Robert Caldwell resulted.

In violation of 18 U.S.C. §§ 2261A(1)(A), 2261(b) and 2.

COUNT 4
[INTENTIONALLY OMITTED]

COUNT 5
[18 U.S.C. § 1512(c)(1)]

On or around August 15, 2017, in the Southern District of Ohio, **TAWNNEY M. CALDWELL** (a/k/a **TAWNNEY THOMAS**) corruptly altered, destroyed, mutilated, and concealed an object, to wit: the contents and data of a cellular telephone, with the intent to impair its integrity or availability for use in an official proceeding.

In violation of 18 U.S.C. § 1512(c)(1).

COUNT 6
[18 U.S.C. §§ 1512(b) and 2]

On or around November 17, 2017, in the Southern District of Ohio, **TAWNNEY M. CALDWELL** (a/k/a **TAWNNEY THOMAS**) and **CHANDRA D. HARMON** aiding and abetting each other, used intimidation, threatened, and corruptly persuaded another person, or attempted to do so, and engaged in misleading conduct toward another person with the intent to

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influence, delay, and prevent the testimony of any person in an official proceeding with regard to evidence related to Counts Two, Three and Four of this Indictment, which are incorporated herein by reference.

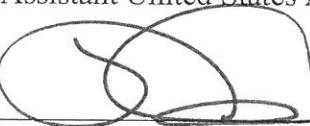
In violation of 18 U.S.C. §§ 1512(b) and 2.

A TRUE BILL

IS/Seigel
FOR PERSON

DAVID M. DEVILLERS
United States Attorney


AMY M. SMITH
Assistant United States Attorney


LAURA I. CLEMMENS
Assistant United States Attorney